

Michael Hausfeld
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Attorneys for Balintulo Plaintiffs

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Debtors.**

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**VERIFIED STATEMENT OF HAUSFELD LLP
PURSUANT TO BANKRUPTCY RULE 2019**

Hausfeld LLP (“Hausfeld”) represents the creditors and parties in interest identified below. Steig Olson, a partner of the firm, on behalf of Hausfeld, pursuant to Rule 2019 of the Federal Rules of Bankruptcy, makes the following representations in connection with this verified statement:

1. Hausfeld represents the following creditors and parties-in-interests in their capacities as named plaintiffs in the matter *Balintulo et al. v. Daimler AG et al.* (collectively ***Balintulo Plaintiffs***”), in which Debtor Motors Liquidation Company (“Debtors”), f/k/a General Motors Corporation (“GM”), is a named Defendant:

- a. Sakwe Balintulo: Cape Town, Western Cape Province, SA
- b. Dennis Vincent Frederick Brutus (deceased, Dec. 2009): Tony Brutus, next of kin: Cape Town, Western Province, SA
- c. Mark Fransch: Cape Town, Western Cape Province, SA
- d. Elsie Gishi: Cape Town, Western Cape Province, SA
- e. Lesiba Kekana: Kuruman, Northern Cape Province, SA
- f. Archington Madondo: Johannesburg, Gauteng Province, SA
- g. Mpho Alfre Masemola: Springs, Gauteng Province, SA
- h. Michael Mbele: Soweto, Gauteng Province, SA
- i. Mamosadi Catherine Mlangeni: Soweto, Gauteng Province, SA
- j. Reuben Mphela: Tswane, Gauteng Province, SA
- k. Thulani Nunu: Cape Town, Western Cape Province, SA
- l. Thandiwe Shezi: Johannesburg, Gauteng Province, SA
- m. Thobili Sikani: Cape Town, Western Cape Province, SA

2. The *Balintulo* Plaintiffs have contingent and unliquidated claims in the above captioned Chapter 11 proceeding pursuant to their claims in the putative class action *Balintulo et al. v. Daimler AG et al.*, No. MDL 02-1499 (S.D.N.Y.) under the Alien Tort Statute against GM. Each of the above *Balintulo* Plaintiffs is a victim of apartheid, torture or cruel, inhumane and degrading treatment, or is a personal representative of a victim of extrajudicial killing, by the South African apartheid security forces between 1960 and 1994 and allege, in their complaint against GM, that GM aided and abetted these crimes in violation of international law, and seek

damages and other relief from Debtor. *Balintulo* plaintiffs seek to represent a class of all those similarly situated.

3. Hausfeld attorneys have represented the *Balintulo* Plaintiffs since they filed their initial complaint in 2003 in the U.S. District Court for the Southern District of New York (MDL No.02-1499) and throughout the prosecution of their claims in that Court, now stayed pending appeal, and represent them here as creditors and parties in interest in the above captioned Chapter 11 cases.

4. Upon information and belief, Hausfeld does not hold any claims against or equity interests in the Debtors.

I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated: June 22, 2010
New York, New York

HAUSFELD LLP

By: /s/ Steig Olson
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